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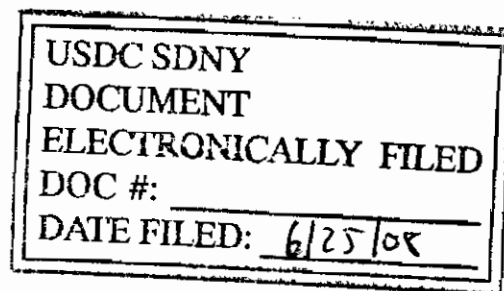
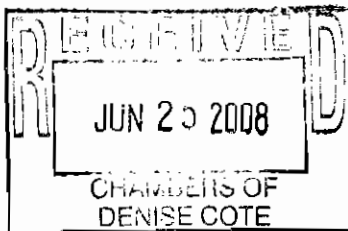
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**MEMO ENDORSED**

June 25, 2008

Via Hand Delivery

Honorable Denise Cote  
United State District Judge  
United States Courthouse  
500 Pearl Street, Room 1040  
New York, NY 10007



Re: Trustees of the 1199/SEIU Greater New York Benefit Fund v. Kingsbridge Heights Rehabilitation Care Center 07 CV 9744 (DLC) (THK)

Dear Judge Cote:

We represent plaintiffs in the above matter. During a June 25, 2008 telephone conference with Magistrate Judge Katz, we asked that defendant be required to post a bond to secure any judgment entered against it in this matter. The reasons for our request are set forth in our June 24, 2008 letter to Magistrate Judge Katz, a copy of which is attached. At the June 25<sup>th</sup> conference, Magistrate Judge Katz advised us that we should make this bond request to Your Honor because he had only been assigned to this case for settlement purposes.

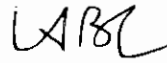
In light of that, and for the reasons set out in the attached June 24, 2008 letter to Magistrate Judge Katz, we now ask Your Honor to require defendant to post a bond to secure any judgment issued against it in this case. We are available for an in person conference to address this at any time after 11:30 a.m. on June 27<sup>th</sup>. In addition, we are available for a telephone conference to address this after 5:15 p.m. on the afternoon of June 26<sup>th</sup>.

*Denial for failure to provide any legal authority  
for imposition of a pre-judgment bond.  
Denise Cote  
June 25, 2008*

Honorable Denise Cote  
June 25, 2008  
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Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. B. Kolko'.

Hanan B. Kolko

HBK:ptp

Attachment

Cc: Paul Sod (*Via e-mail w/enclosure*)  
Ernest Collazo (*Via e-mail w/enclosure*)